This Track 1 Decision Document is marked "Revision A" but is a final document signed by the agencies.

Date 3/3/2005

DOE/ID-10990
Revision A
September 2002

Site PBF-35 Track 1 Decision Documentation Package, OU 10-08

DECISION DOCUMENTATION PACKAGE
COVER SHEET

Prepared in accordance with

TRACK 1 SITES:
GUIDANCE FOR ASSESSING
LOW PROBABILITY HAZARD SITES
AT THE INEEL

Site Description: Abandoned Power and Control Cables Between Buildings at the PBF Complex

Site ID: PBF-35 **Operable Unit: 10-08**

Waste Area Group: 10

I. SUMMARY – Physical description of the site:

Site Power Burst Facility (PBF)-35 consists of abandoned power and control cables between the PBF facilities including the Mixed Waste Storage Facility (PBF-613), the PBF Control Area Control Building (PBF-619), the Control Building and addition (PER-601), the Waste Reduction Operations Complex (WROC) Support Building (PBF-632), the WROC Operations Support Building (PBF–641), and the PBF Reactor Building (PBF-620). Photographs show multiple cable runs above-grade, slightly below-grade, and in wooden cable trays near roads.

Most of the cables were in use between approximately 1955 and 1980, but, while most are no longer used in the conduct of PBF operations and are not intended to be used in the future, some cables running to PBF-620 are still active. The PBF-620 cables will remain active until the fuel is removed from the PBF reactor.

An initial concern by the new site identification form author was that buried cables could contain lead sheathing and polychlorinated biphenyl (PCB) saturated internal wrapping. In accordance with Management Control Procedure-3448, Reporting or Disturbance of Suspected Inactive Waste Sites, a new site identification form was completed for this site. However, at a few locations all the cables run through aboveground wooden box trays before the cable cross under the roads. At some of these locations the cables are cut, exposing the inner wires. The wires are also cut in several other locations. Based on visual examination of the cut ends, the cables appear lead-free and none of the cables have oil-saturated internal wrapping that could contain PCBs.

DECISION RECOMMENDATION

II. SUMMARY - Qualitative Assessment of Risk:

Although originally hypothesized that lead and PCBs could be present in the buried cable runs, visual inspections representative groups of cables at several locations showed that none of the cables contained lead or PCBs.

The reliability of information provided in this report is high. Interviews were conducted with Environmental Management Environment Safety and Health (EM ES&H) personnel who were present for the site visits.

III. SUMMARY - Consequences of Error:

False negative error:

If the true condition is that the site's risk is unacceptable, but the data lead the decision makers to decide that the site's risk is acceptable, then the data have lead to an erroneous decision of no remedial action, which leads to increased risk to human health and environment.

False positive error:

If the true condition is that the site's risk is acceptable, but the data lead the decision makers to decide that the site's risk is unacceptable, then the data have lead to an erroneous decision that will be costly in terms of unnecessary cleanup.

IV. SUMMARY - Other Decision Drivers:

The cables at this site do not clearly represent an unacceptable risk to human health and the environment. It appears likely that none of the cables contains either lead or PCBs. To act on the remote possibility that this site represents an unacceptable risk would result in less time, less money, and fewer general resources to address other INEEL issues.

Recommended Action:

Based on visual examination of representative groups of cables at several locations, none of the cables contains lead or any oily or asphalt-like substance that could contain PCBs. Because the cables do not show the presence of lead or PCBs, no further action should be taken at this site.

Signatures: 9/23/04 Wendell Kelly for	# Pages: 17	Date: September 15, 2002
Prepared By: Thomas Haney	DOE WAG Manager:	
Approved By: Michael Holdren 9-30-04	Independent Review: Scott Lowe 9/28/04	

Determination

The U.S Department of Energy, U.S Environmental Protection Agency Region 10, and Idaho Department of Environmental Quality have completed the review of the referenced information for site PBF-35 in Operable Unit 10-08 as it pertains to the INEEL Federal Facility Agreement and Consent Order of 1991. Based on this review, the Parties have determined that No Action for purposes of study or investigation should be initiated.

Brief summary of the basis for the recommendation:

See Decision Statement pages. Pg #'s 4, 5, and 6 For signatures.

References:

DOE Project Manager _____ _____
Date

EPA Project Manager _____ _____
Date

IDEQ Project Manager _____ _____
Date

DECISION STATEMENT
(DOE RPM)

Date Received: 1/14/05

Disposition:

No Action will be taken for PBF site # 35
This will be recorded in the site database and listed in 5-Year Review

Date: 1/14/05	# Pages: 1 of 1
Name: Kathleen Hain	Signature: Kathleen E Hain

DECISION STATEMENT
(EPA RPM) Site 35 PBF-

Date Received:

Disposition:

EPA concurs that the ~~abandoned~~ abandoned cable requires no remedial action & should be Classified as a no-Action site.

Date: 9-23-04	# Pages: 1
Name: DENNIS FAULK	Signature:

DECISION STATEMENT
(IDEQ RPM)

Date Received:

Disposition:

Site PBF-35 Track 1 Decision Documentation Package, OU 10-08

This site consists of abandoned power and control cables between PBF facilities. Most of the cables are no longer used but some running to PBF-620 will remain active until the fuel is removed from the reactor. The cables, which have been cut in several locations, have been visually examined to ensure that the wiring is lead free and that there is no evidence of oil saturated internal wrapping that could contain PCBs.

The State concurs that this is a no action site but does recommend that as the buildings are removed, the cables also should be removed and properly disposed.

Date: August 6, 2004	# Pages: 1
Name: Daryl F. Koch	Signature:

PROCESS/WASTE WORKSHEET SITE ID: PBF-35	PROCESS: Abandoned Power and Control Cables Between Buildings at the PBF Complex WASTE: Industrial	
Col 1 Processes Associated With This Site	Col 2 Waste Description & Handling Procedures	Col 3 Description & Location of any Artifacts/Structures/Disposal Areas Associated with this Waste or Process
The cables provided power and communications between the PBF buildings.	Except for to cables running to PBF-20, the cables are no longer used in the conduct of the PBF operations and are not intended to be used in the future.	**Artifacts:** Power and control cables. **Location:** On the surface and shallowly buried between several PBF buildings. **Description:** Multiple black cables containing copper wire.

CONTAMINANT WORKSHEET

SITE ID: PBF-35

PROCESS: (Col 1) Abandoned Power and Control Cables Between Buildings at the PBF WASTE: (Col 2) Industrial

Col 4 What Known/Potential Hazardous Substance/Constituents are Associated with this Waste or Process?	Col 5 Potential Sources Associated with this Hazardous Material	Col 6 Known/Estimated Concentration of Hazardous Substances/ Constituents	Col 7 Risk-based Concentration	Col 8 Qualitative Risk Assessment (hi/med/low)	Col 9 Overall Reliability (high/med/ low)
Lead	Air, soil	0 mg/kg	400 mg/kg	Low	High
PCBs	Air, soil	0 mg/kg	2.9 mg/kg	Low	High

Question 1. What are the waste generation processes, locations, and dates of operation associated with this site?

Block 1. Answer:

Site PBF-35 consists of abandoned power and control cables located aboveground, underground, and on berms between buildings associated with the PBF complex. Photographs show multiple cable runs above-grade. Most of the cables were used between approximately 1955 and 1980. Except for some that run to PBF-620, the cables are no longer used in the conduct of the PBF operations and are not intended to be used in the future.

Block 2. How reliable are the information sources? X High _Med _Low (check one)
Explain the reasoning behind this evaluation.

Drawings show cables between buildings and photographs confirm their presence.

Block 3. Has this INFORMATION been confirmed? X Yes _No (check one)
If so, describe the confirmation.

Photographs confirm the information.

Block 4. Sources of information [check appropriate box(es) & source number from reference list].

No available information	[ ]		Analytical data	[ ]
Anecdotal	[ ]		Documentation about data	[ ]
Historical process data	[ ]		Disposal data	[ ]
Current process data	[ ]		Q.A. data	[ ]
Photographs	[x]	1	Safety analysis report	[ ]
Engineering/site drawings	[ ]		D&D report	[ ]
Unusual Occurrence Report	[ ]		Initial assessment	[ ]
Summary documents	[x]	3	Well data	[ ]
Facility SOPs	[ ]		Construction data	[ ]
New Site Form	[x]	2		

Question 2. What are the disposal processes, locations, and dates of operation associated with this site? How was the waste disposed?

Block 1. Answer:

Site PBF-35 consists of abandoned power and control cables located on the ground, underground, and on berms between buildings associated with the PBF complex. Photographs show multiple runs above-grade. Most of the cables were used between approximately 1955 and 1980. Except for some that run to PBF-620, the cables are no longer used in the conduct of the PBF operations and are not intended to be used in the future.

Block 2. How reliable are the information sources? _ High _X Med _Low (check one)
Explain the reasoning behind this evaluation.

Photographs and drawings show the cables.

Block 3. Has this INFORMATION been confirmed? X Yes No (check one)
If so, describe the confirmation.

The presence of cables is confirmed. The absence of lead and PCBs was visually confirmed.

Block 4. Sources of information [check appropriate box(es) & source number from reference list].

No available information	[ ]		Analytical data	[ ]
Anecdotal	[ ]		Documentation about data	[ ]
Historical process data	[ ]		Disposal data	[ ]
Current process data	[ ]		Q.A. data	[ ]
Photographs	[x]	1	Safety analysis report	[ ]
Engineering/site drawings	[ ]		D&D report	[ ]
Unusual Occurrence Report	[ ]		Initial assessment	[ ]
Summary documents	[x]	3	Well data	[ ]
Facility SOPs	[ ]		Construction data	[ ]
New Site Form	[x]	2		

Question 3. Is there evidence that a source exists at this site? If so, list the sources and describe the evidence.

Block 1. Answer:

Field observations revealed that the visible cable ends did not contain lead and did not contain potentially PCB-saturated internal wrapping.

Block 2. How reliable are the information sources? X High _Med _Low (check one)
Explain the reasoning behind this evaluation.

Field observations showed that the cables did not contain lead or a substance that might contain PCBs.

Block 3. Has this information been confirmed? X Yes _No (check one)
If so, describe the confirmation.

Site visits and photographs confirm the information.

Block 4. Sources of information [check appropriate box(es) & source number from reference list].

No available information	[ ]		Analytical data	[ ]
Anecdotal	[ ]		Documentation about data	[ ]
Historical process data	[ ]		Disposal data	[ ]
Current process data	[ ]		Q.A. data	[ ]
Photographs	[x]	1	Safety analysis report	[ ]
Engineering/site drawings	[ ]		D&D report	[ ]
Unusual Occurrence Report	[ ]		Initial assessment	[ ]
Summary documents	[x]	3	Well data	[ ]
Facility SOPs	[ ]		Construction data	[ ]
New Site Form	[x]	2		

Question 4. Is there empirical, circumstantial, or other evidence of migration? If so, what is it?

Block 1. Answer:

There is no visual evidence of migration at this site. The absence of lead and/or PCBs was visually confirmed during site visits.

Block 2. How reliable are the information sources? X High _Med _Low (check one)
Explain the reasoning behind this evaluation.

Contaminant migration is not possible without contaminants.

Block 3. Has this information been confirmed? X Yes _No (check one)
If so, describe the confirmation.

Site inspections revealed no visual evidence of contaminants or migration.

Block 4. Sources of information [check appropriate box(es) & source number from reference list].

No available information	[ ]		Analytical data	[ ]
Anecdotal	[ ]		Documentation about data	[ ]
Historical process data	[ ]		Disposal data	[ ]
Current process data	[ ]		Q.A. data	[ ]
Photographs	[x]	1	Safety analysis report	[ ]
Engineering/site drawings	[ ]		D&D report	[ ]
Unusual Occurrence Report	[ ]		Initial assessment	[ ]
Summary documents	[x]	3	Well data	[ ]
Facility SOPs	[ ]		Construction data	[ ]
New Site Form	[x]	2		

Question 5. Does site operating or disposal historical information allow estimation of the pattern of potential contamination? If the pattern is expected to be a scattering of hot spots, what is the expected minimum size of a significant hot spot?

Block 1. Answer:

There is no expected pattern of contamination.

Block 2. How reliable are the information sources? X High _Med _Low (check one) Explain the reasoning behind this evaluation.

This evaluation was derived from the visual appearance of the cables during site investigations. Photographs indicate that the soil is not stained or discolored and vegetation near the cables is well established.

Block 3. Has this information been confirmed? X Yes No (check one)
If so, describe the confirmation.

Site investigations and photographs of the site provide information for this estimate.

Block 4. Sources of information [check appropriate box(es) & source number from reference list].

No available information	[ ]		Analytical data	[ ]
Anecdotal	[ ]		Documentation about data	[ ]
Historical process data	[ ]		Disposal data	[ ]
Current process data	[ ]		Q.A. data	[ ]
Photographs	[x]	1	Safety analysis report	[ ]
Engineering/site drawings	[ ]		D&D report	[ ]
Unusual Occurrence Report	[ ]		Initial assessment	[ ]
Summary documents	[x]	3	Well data	[ ]
Facility SOPs	[ ]		Construction data	[ ]
New Site Form	[x]	2		

Question 6. Estimate the length, width, and depth of the contaminated region. What is the known or estimated volume of the source? If this is an estimated volume, explain carefully how the estimate was derived.

Block 1. Answer:

Although cables are present, neither lead nor oil-saturated internal wrapping is present. There does not appear to be a contaminated region to estimate.

Block 2. How reliable are the information sources? _High X Med _Low (check one)
Explain the reasoning behind this evaluation.

The volume of contamination cannot be estimated without the actual presence of contamination.

Block 3. Has this INFORMATION been confirmed? X Yes _No (check one)
If so, describe the confirmation.

Visual inspections and photographs confirm the information.

Block 4. Sources of information [check appropriate box(es) & source number from reference list].

No available information	[ ]		Analytical data	[ ]
Anecdotal	[ ]		Documentation about data	[ ]
Historical process data	[ ]		Disposal data	[ ]
Current process data	[ ]		Q.A. data	[ ]
Photographs	[x]	1	Safety analysis report	[ ]
Engineering/site drawings	[ ]		D&D report	[ ]
Unusual Occurrence Report	[ ]		Initial assessment	[ ]
Summary documents	[x]	3	Well data	[ ]
Facility SOPs	[ ]		Construction data	[ ]
New Site Form	[x]	2		

Question 7. What is the known or estimated quantity of hazardous substance/constituent at this source? If the quantity is an estimate, explain carefully how the estimate was derived.

Block 1. Answer:

There is no known or estimated quantity of contamination.

Block 2. How reliable are the information sources? _High X Med _Low (check one)
Explain the reasoning behind this evaluation.

Visual inspections confirmed the absence of lead and/or PCBs.

Block 3. Has this INFORMATION been confirmed? X Yes _No (check one)
If so, describe the confirmation.

The presence of lead and PCBs cannot be confirmed with existing information.

Block 4. Sources of information [check appropriate box(es) & source number from reference list].

No available information	[ ]		Analytical data	[ ]
Anecdotal	[ ]		Documentation about data	[ ]
Historical process data	[ ]		Disposal data	[ ]
Current process data	[ ]		Q.A. data	[ ]
Photographs	[x]	1	Safety analysis report	[ ]
Engineering/site drawings	[ ]		D&D report	[ ]
Unusual Occurrence Report	[ ]		Initial assessment	[ ]
Summary documents	[x]	3	Well data	[ ]
Facility SOPs	[ ]		Construction data	[ ]
New Site Form	[x]	2		

Question 8. Is there evidence that this hazardous substance/constituent is present at the source as it exists today? If so, describe the evidence.

Block 1. Answer:

Cables are present at this site. No visual evidence exists that hazardous constituents are present.

Block 2. How reliable are the information sources? _High X Med _Low (check one)
Explain the reasoning behind this evaluation.

This evaluation is based on site visitations and photographs of the site.

Block 3. Has this INFORMATION been confirmed? X Yes _No (check one)
If so, describe the confirmation.

Hazardous constituents cannot be confirmed with existing information.

Block 4. Sources of information [check appropriate box(es) & source number from reference list].

No available information	[ ]		Analytical data	[ ]
Anecdotal	[ ]		Documentation about data	[ ]
Historical process data	[ ]		Disposal data	[ ]
Current process data	[ ]		Q.A. data	[ ]
Photographs	[x]	1	Safety analysis report	[ ]
Engineering/site drawings	[ ]		D&D report	[ ]
Unusual Occurrence Report	[ ]		Initial assessment	[ ]
Summary documents	[x]	3	Well data	[ ]
Facility SOPs	[ ]		Construction data	[ ]
New Site Form	[x]	2		

REFERENCES

DOE, 1992, Track 1 Sites: Guidance for Assessing Low Probability Sites at the INEL, DOE/ID-10390 (92), Revision 1, U.S. Department of Energy, Idaho Falls, Idaho, July.

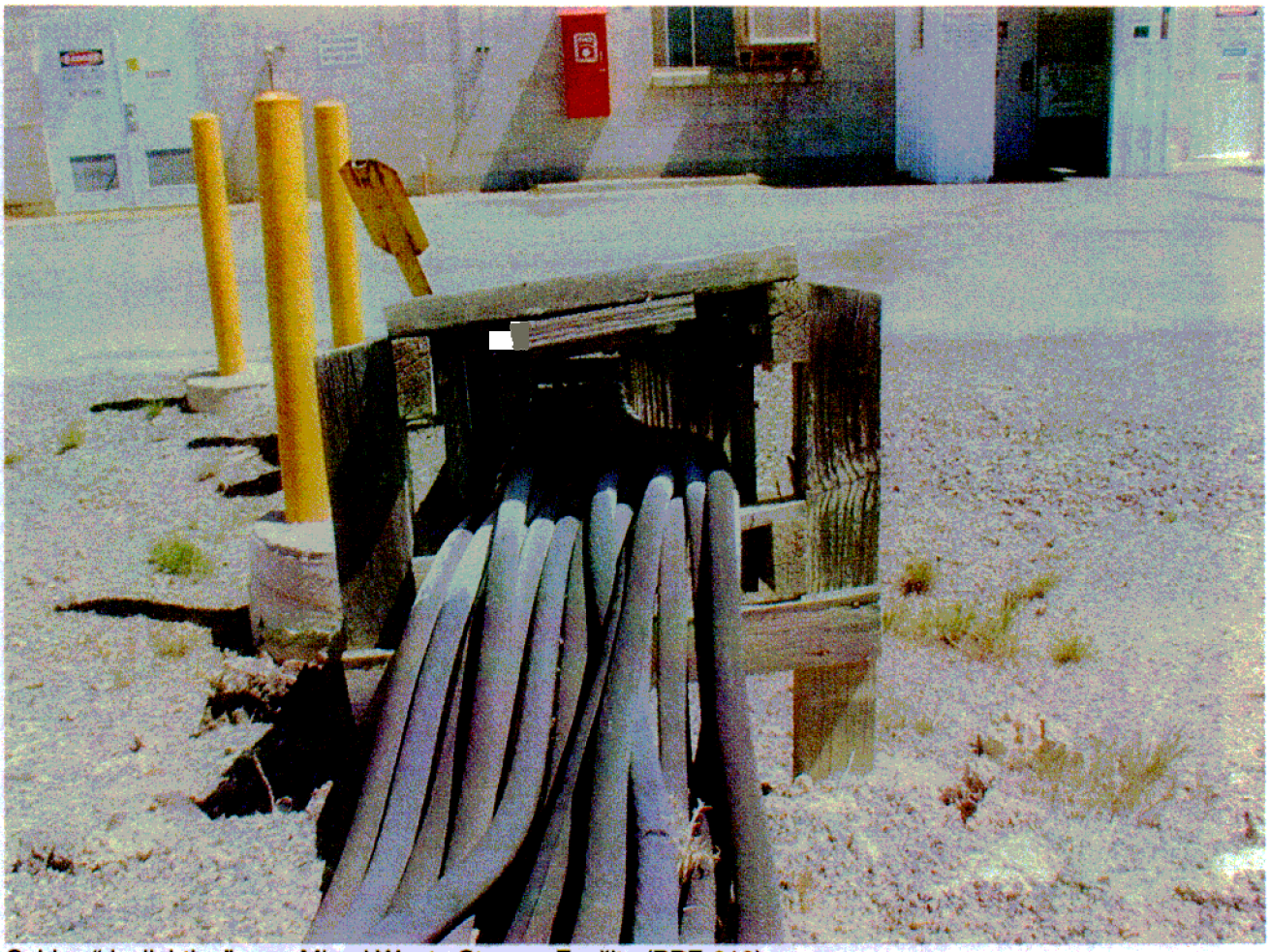
1. Site photographs.
2. Drawing showing PBF area cables. Drawing showing PBF area communication cables.
3. New Site Identification Form, completed by Robert Akins, February 20, 2001.

Attachments

Photographs of Site PBF-35

Cut cables near PBF Control Area Control Building (PBF-619)

Cables near WROC Operations Support Building (PBF–641)



Cables “daylighting” near Mixed Waste Storage Facility (PBF-613)

PBF-35 Area Drawings

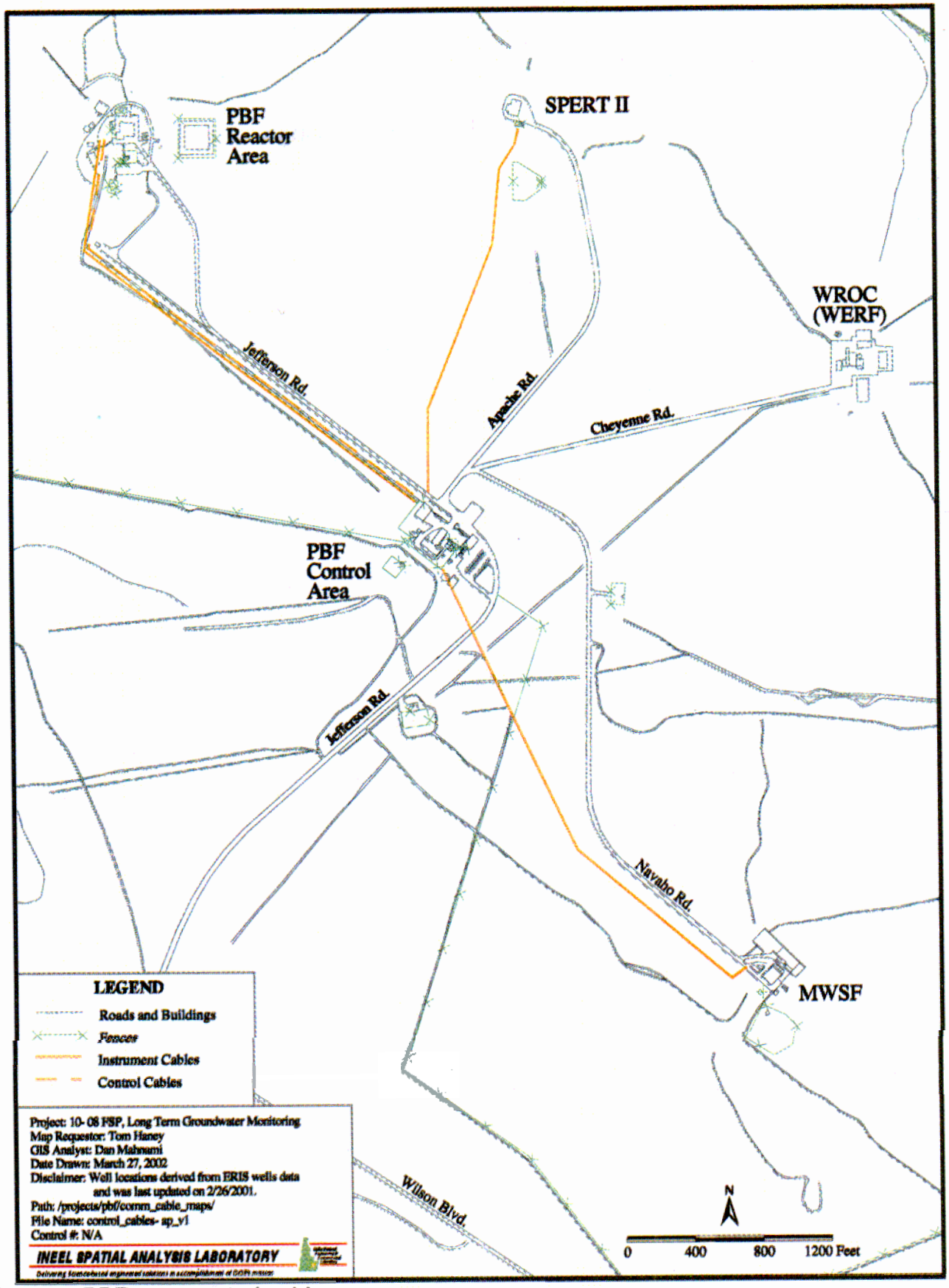


Figure 1. PBF area control cables

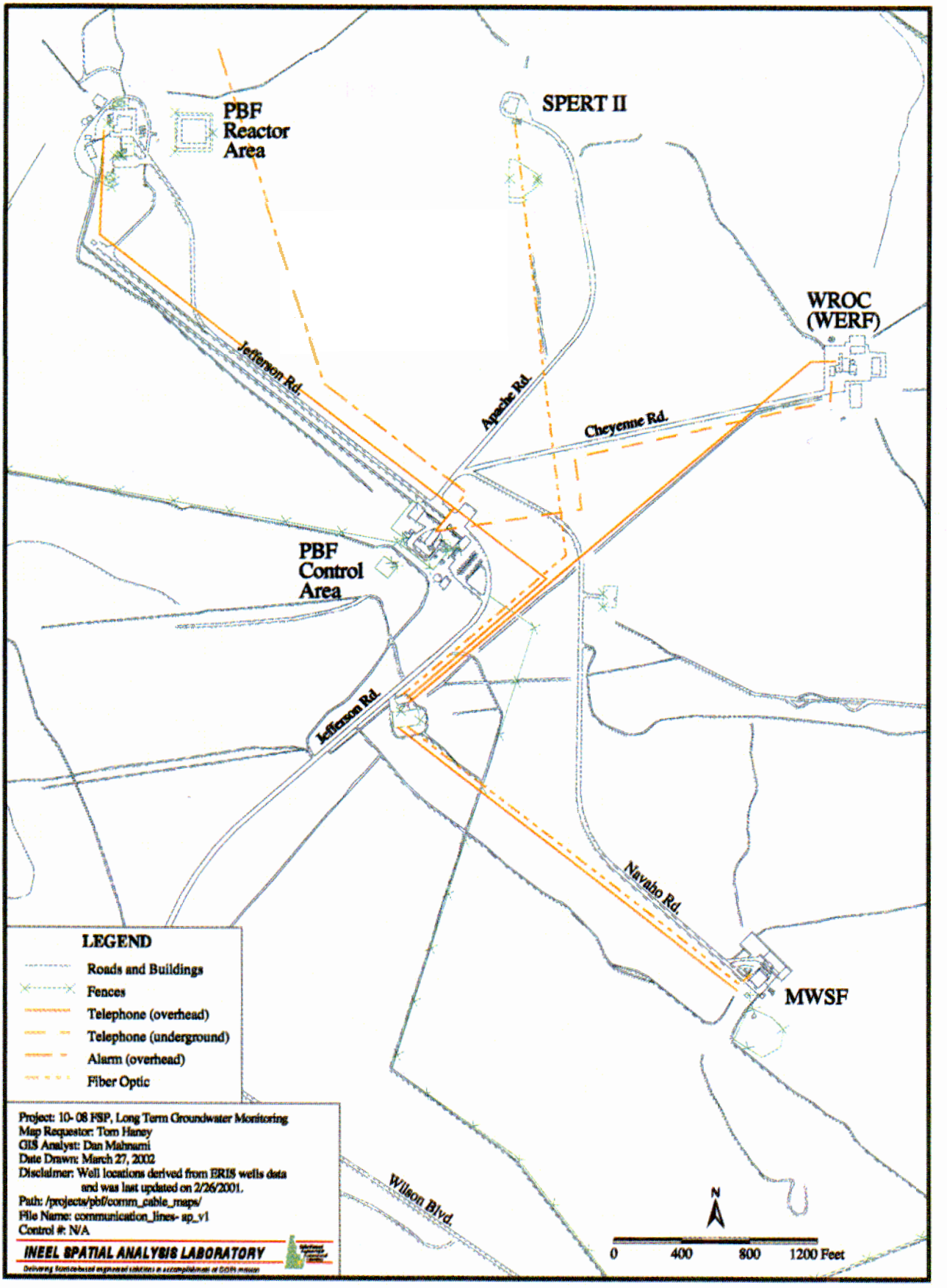


Figure 2. Communication lines at PBF

PBF-35 New Site Identification Form

Document No. 10930

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04/14/99
Rev. 03

NEW SITE IDENTIFICATION

Part A – To Be Completed By Observer	
1. Person Initiating Report: Robert G. Akins	Phone: 526-7253
Contractor WAG Manager: Frank L. Webber	Phone: 525-8507

2. Site Title: PBF-35: Abandoned Power and Control Cables between buildings at the PBF complex.

3. Describe the conditions that indicate a possible inactive or unreported waste site. Include location and description of suspicious condition, amount or extent of condition and date observed. A location map and/or diagram identifying the site against controlled survey points or global positioning system descriptors shall be included to help with the site visit. Include any known common names or location descriptors for the waste site.

Abandoned power and control cables are located on top of the ground on a berm around buildings PER-613, -619, -632, and -641. Other potenial sites are PER-601 and the three guard gates. Pictures of PER-619 and PER-641 cables are attached. Plan drawings (attached) indicate that there are multiple generations of cable runs, with the earlier sets buried 2 to 3 ft below grade. The buried cables are thought to have been there for approximately 35 years (1965) and the cables on the top of the berms are thought to have been installed in 1974.

The newer set of cables are exposed and at a few locations cut ends are visible. These cables appear to be lead-free. The buried cables are not exposed for observation, and it is possible that these cables contain lead-sheathing, and PCBs in the coating material. The multi-cables lines (approximately 12-50 per run) could total 100 miles or more.

The SPERT reactors were abandoned in the 1970's and were subsequently D&D'd: SPERT I in 1984 and 1985, SPERT II and III in 1980, and SPERT IV in 1979.

Part B – To Be Completed By Contractor WAG Manager

4. Recommendation:

☒ This site meets the requirements for an inactive waste site, requires investigation, and should be included in the INEEL FFA/CO Action Plan. Proposed Operable Unit assignment is recommended to be included in the FFA/CO.
WAG: 10 Operable Unit: 10-08

☐ This site DOES NOT meet the requirements for an inactive waste site, DOES NOT require investigation and SHOULD NOT be included in the INEEL FFA/CO Action Plan.

5. Basis for the recommendation:

There is the potential for lead and PCBs in the buried cable runs, which could pose a risk to human health or ecological receptors if they are left in place. If lead and PCBs are present, these contaminants could be released to the environment if the cable degraded in the soil. Since the cables are buried at a shallow depth, contaminants would be available to ecological receptors, and could have a complete exposure pathway for occupational and future residential scenarios. An investigation should be conducted to assess the risk.

Interfaces with other programs would include D&D and PBF facility operations.

This site meets the requirements for an inactive waste site, requires investigation, and should be included in the FFA/CO.

The basis for recommendation must include: (1) source description; (2) exposure pathways; (3) potential contaminants of concern; and (4) descriptions of interfaces with other programs, as applicable (e.g., D&D, Facility Operations, etc.)

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04/14/99
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NEW SITE IDENTIFICATION

6. Contractor WAG Manager Certification: I have examined the proposed site and the information submitted in this document and believe the information to be true, accurate, and complete. My recommendation is indicated in Section 4 above.

Name: Frank L. Webber Signature: Frank Webber Date: 2/20/01

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04/14/99
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NEW SITE IDENTIFICATION

Part C – To Be Completed By INEEL FFA/CO WAG Managers

7. WAG Operable Unit:

DOE WAG Manager's Concurrence: ☒ Concur with recommendation. ☐ Do not concur with the recommendation.

Signature: Carol A Hathaway

Date: 2-21-01

EPA WAG Manager's Concurrence: ☒ Concur with recommendation. ☐ Do not concur with the recommendation.

Signature: Rex Baston

Date: 3/6/01

State of Idaho WAG Manager's Concurrence: ☒ Concur with recommendation. ☐ Do not concur with the recommendation.

Signature: Ted Zamiarski

Date: 3/13/01

Explanation follows:

Part D – To Be Completed By The INEEL FFA/CO Responsible Program Managers (RPM's)

8. FFA/CO RPM's Concurrence:

For DOE-ID

Name: Kathleen Hain Signature: Kathleen E Hain Date: 2/21/01

☒ Concur
☐ Do not concur. Explanation follows:

For EPA Region X

Name: Wayne Pierre Signature: Wayne Pierre Date: 3/7/01

☒ Concur
☐ Do not concur. Explanation follows:

For State of Idaho

Name: Dean Nygard Signature: Daryl L. Koch Date: 3/13/01

☒ Concur
☐ Do not concur. Explanation follows: